Exhibit E

Richard Kadrey, et al. v. Meta Platforms, Inc. Highly Confidential

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Page 1
        IN THE UNITED STATES DISTRICT COURT
          NORTHERN DISTRICT OF CALIFORNIA
               SAN FRANCISCO DIVISION
RICHARD KADREY, et
                                 )
                     al.,
Individual and Representative
                                 )
                                    Lead Case No.
Plaintiffs,
                                    3:23-cv-03417-VC
     V.
Meta Platforms, Inc.,
Defendant.
     ** HIGHLY CONFIDENTIAL **
         30(b)(6) VIDEOTAPED DEPOSITION OF
                META PLATFORMS, INC.
             BY: MICHAEL PATRICK CLARK
                  Denver, Colorado
                  VOLUMES I AND II
            Wednesday, November 13, 2024
            Thursday, November 14, 2024
           Reported stenographically by:
    Michelle Kirkpatrick, RDR-CRR-CRC-CRI, FCRR
               DIGITAL EVIDENCE GROUP
            1730 M Street, NW, Suite 812
               Washington, D.C. 20036
                   (202) 232-0646
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Richard Kadrey, et al. v. Meta Platforms, Inc. Highly Confidential

	Page 9
1	EXAMINATION
2	BY MS. POUEYMIROU:
3	Q Good evening, Mr. Clark.
4	A Good evening.
5	Q So you have spent many hours today giving
6	testimony in your personal capacity.
7	A Yes.
8	Q Do you understand what that means?
9	A I do.
10	Q And so this evening we'll start as the
11	corporate designee of Meta.
12	What does that mean to you?
13	MS. HARTNETT: Object to the form.
14	A It means to me that I'm going to represent
15	responses to a specific set of topics and topics
16	that, unlike my personal recollection, took time to
17	actually prepare and get information to be able to
18	respond on behalf of the company.
19	BY MS. POUEYMIROU:
20	Q And with respect to the preparation, did
21	you review the deposition notice of the topics that
22	you've been offered for?

Richard Kadrey, et al. v. Meta Platforms, Inc. Highly Confidential

	Page 10
1	A I did.
2	Q And you guys prepared a binder today of
3	documents that you reviewed in preparation for these
4	topics?
5	A Yes.
6	Q Were these documents that you chose or
7	that your lawyers chose?
8	A Most of the documents were documents that
9	the lawyers chose.
10	Q Okay. And how did you review the did
11	you review all of these documents in preparation?
12	A I did walk through and look at each and
13	every one of the documents and then also spoke to
14	some individuals to get more clarification on
15	questions about some of the topics.
16	Q And who did you speak with?
17	A I spoke with Nikolay Bashlykov,
18	Sara Chugh, Lauren Cohen, Brooks Cutter, Angela Fan,
19	Ahuva Goldstand, Nick Grudin, Shaun Lindsay,
20	Steve Satterfield, and Xiaolan Wang.
21	Q And do you understand the Llama models at
22	issue in this case which Llama models are at

Richard Kadrey, et al. v. Meta Platforms, Inc. Highly Confidential

	Page 200
1	STENOGRAPHIC REPORTER'S CERTIFICATE
2	I, Michelle Kirkpatrick, a Registered
3	Diplomate Reporter, Federal Certified Realtime
4	Reporter, do hereby certify that previous to the
5	commencement of the examination, the deponent was duly
6	sworn by me to testify to the truth.
7	I further certify that this deposition
8	was taken in shorthand by me at the time and place
9	herein set forth and was thereafter reduced to
10	typewritten form, and the foregoing constitutes a true
11	and correct transcript.
12	I further certify that I am not related
13	to, employed by, nor of counsel for any of the parties
14	or attorneys herein nor otherwise interested in the
15	outcome of this action.
16	IN WITNESS WHEREOF, I have hereunto set
17	my hand this 18th day of November, 2024.
18	
19	Midelle Kulphile
	I takelle burger a
20	MICHELLE KIRKPATRICK
	RDR-CRR-CRC-CRI, FCRR
21	Registered Diplomate Reporter
22	Federal Certified Realtime Reporter